



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

SEP 17 2012

Town of Preston  
c/o the Preston Redevelopment Authority  
Attn: Frank Ennis, PRA Site Operations Director  
389 Route 2  
Preston, Connecticut 06365

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c),  
and § 761.79(h)  
Abraham Ribicoff Research Center Building – Former Norwich State Hospital  
50 Route 12 / Preston, Connecticut

Dear Mr. Ennis:

This is in response to the Town of Preston (the Town) Notification<sup>1</sup> for approval to clean up and dispose of PCB-contaminated building materials located in the building known as the Abraham Ribicoff Research Center Building (the Site) and located on the former Norwich State Hospital property at Parcel A, 50 Route 12 in Preston, Connecticut. The Site contains PCB caulk that exceeds the allowable PCB levels under the federal PCB regulations at 40 CFR § 761.20(a) and § 761.62.

In its Notification, the Town has proposed the following PCB cleanup and disposal plan:

- Remove all caulk and associated windows and door units and dispose as a *PCB bulk product waste* in a TSCA-approved disposal facility or RCRA hazardous waste landfill;
- Decontaminate PCB-contaminated *non-porous surfaces* (e.g., steel lintels and granite) to achieve a PCB cleanup standard of  $< 10 \mu\text{g}/100 \text{ cm}^2$ , or alternatively dispose of the *non-porous surfaces* as a *PCB bulk product waste*;

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<sup>1</sup> The Notification was prepared by Tighe & Bond on behalf of the Town of Preston to satisfy the notification requirement under 40 CFR §§ 761.61(a)(3) and (c) and § 761.79(h). Information was submitted dated January 2012 (Self-Implementing PCB Cleanup Plan (SIP)); April 16, 2012 (email photos and clarification on waste classification); June 15, 2012 (Revised SIP and Response to EPA Comments); August 21, 2012 (revised SIP and Contractor Work Plan); August 28, 2012 (Revised Contractor Work Plan); September 4, 2012 (Revised SIP and Contractor Work Plan); and, September 7, 2012 (Final Revised SIP and Contractor Work Plan). These submittals shall be referred to as the "Notification".

- Remove *PCB remediation waste* (i.e., building substrates located adjacent to greater than or equal to ( $\geq$ ) 50 parts per million (ppm) PCB caulk) and dispose of as a  $\geq$  50 ppm PCB waste in a TSCA-approved disposal facility or RCRA hazardous waste landfill in accordance with § 761.61(a)(5)(i)(B)(2)(iii);
- Remove *PCB remediation waste* with greater than ( $>$ ) 1 ppm but less than ( $<$ ) 50 ppm and dispose of in accordance with § 761.61(a)(5)(i)(B)(2)(ii) or § 761.61(a)(5)(i)(B)(2)(iii);
- Excavate PCB-contaminated soils with  $<$  50 ppm and dispose of in a state-approved landfill in accordance with § 761.61(a)(5)(i)(B)(2)(ii); and,
- Conduct verification sampling in soil and in building substrates (i.e., brick and concrete) to confirm that the PCB cleanup standard of less than or equal to ( $\leq$ ) 1 ppm has been met.

With exception of the proposed verification sampling frequency, the PCB cleanup and disposal plan in the Notification is consistent with the requirements for disposal of *PCB bulk product waste* under § 761.62 and for decontamination and/or disposal of *PCB remediation waste* under § 761.61(a). Based on the characterization data and the proposed remediation, EPA has determined that the alternative sampling is reasonable and will create no unreasonable risk to public health or the environment. EPA may approve the alternative verification sampling in accordance with § 761.61(c).

The Town may proceed with its cleanup in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62; § 761.79(h); its Notification; and this Approval, subject to the conditions of Attachment 1.

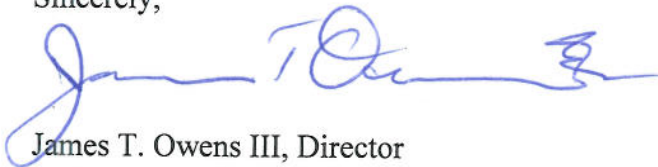
This Approval does not release the Town from any applicable requirements of federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the Connecticut Department of Energy and Environmental Protection (CTDEEP) regulations.

Questions and correspondence pertaining to this approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in blue ink, appearing to read "James T. Owens III", is written over a horizontal line.

James T. Owens III, Director  
Office of Site Remediation & Restoration

cc: J. Olsen, Tight & Bond  
G. Trombly, CTDEEP PCB Program  
A. Peterson, EPA Brownfields Program  
File

Attachment 1: Approval Conditions



## ATTACHMENT 1

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS  
FORMER NORWICH STATE HOSPITAL  
ABRAHAM RIBICOFF RESEARCH CENTER BUILDING (the Site)  
PARCEL A, 50 ROUTE 12  
PRESTON, CONNECTICUT**

### GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Site and identified in the Notification.
2. The Town of Preston (the Town) shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the Town shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town from compliance with any applicable requirements of federal, state or local law; or 3) release the Town from liability for, or otherwise resolve, any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

### **NOTIFICATION AND CERTIFICATION CONDITIONS**

10. This Approval may be revoked if the EPA does not receive written notification from the Town of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. The Town shall submit the following information for EPA review and/or approval:
  - a. a certification signed by its selected contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval; and,
  - b. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical methods and quality assurance requirements specified in the Notification and in this Approval.

### **REMEDIAL AND DISPOSAL CONDITIONS**

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
13. PCB-contaminated materials shall be decontaminated and confirmatory sampling and analysis shall be conducted as described below:
  - a. All visible residues of PCB caulk (i.e., *PCB bulk product waste*) shall be removed as described in the Notification.
  - b. The cleanup standard for bulk *PCB remediation wastes* (i.e., soils) shall be less than or equal to ( $\leq$ ) 1 part per million (ppm). Samples shall be collected on a bulk basis (e.g. mg/kg) and reported on a dry-weight basis. Verification sampling shall comply with 40 CFR Part 761, Subpart O; samples shall be collected from both excavation bottoms and sidewalls, as applicable.



- c. The PCB decontamination standard for *porous surfaces* (i.e., concrete and brick) shall be  $\leq 1$  ppm. Sampling for *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg) and reported on a dry weight analysis. Sampling shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches. Verification sampling shall be conducted in accordance with the sampling frequency specified in the Notification.
  - d. The decontamination standard for *non-porous surfaces* (e.g., steel lintels and granite) shall be  $\leq 10 \mu\text{g}/100 \text{ cm}^2$ . All post-decontamination verification sampling of *non-porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e.  $\mu\text{g}/100 \text{ cm}^2$ ) and samples shall be collected in accordance with the sampling frequency specified in the Notification.
  - e. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
14. All PCB waste (regardless of concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with § 761.40; stored in a manner prescribed in § 761.65; and, disposed of in accordance with 40 CFR § 761.61(a)(5) or § 761.62, unless otherwise specified below:
- a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g).
  - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
  - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

#### **INSPECTION, MODIFICATION AND REVOCATION CONDITIONS**

15. The Town shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

16. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
17. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
18. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

#### **RECORDKEEPING AND REPORTING CONDITIONS**

19. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the decontamination and the analytical sampling shall be established and maintained by the Town in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
20. The Town shall submit a final report to the EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the decontaminated area(s); copies of manifests and bills of lading; and, copies of certificates of disposal or similar certifications issued by the disposer.
21. Required submittals shall be mailed to:  
  
Kimberly N. Tisa, PCB Coordinator (OSRR07-2)  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527

22. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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**END OF ATTACHMENT 1**